

KEVIN G. HORBATIUK (KGH-4977)
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CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**

21 MC 102 (AKH)

-----x
MARK ENGELBRECHT and ANNE ENGELBRECHT,

**DOCKET NO:
07 CV 8274**

Plaintiffs,

-against-

**7 WORLD TRADE COMPANY, L.P., A RUSSO
WRECKING, INC., ABM INDUSTRIES INC.,
ABM JANITORIAL NORTHEAST, INC., AMEC
MANAGEMENT, INC., AMEC EARTH
ENVIRONMENTAL, INC., ANTHONY CORTESE
SPECIALIZED HAULING LLC., ATLANTIC
HEYDT CORP., BECHTEL ASSOCIATES PROFESSIONAL
CORPORATION; BECHTEL CONSTRUCTION, INC.,
BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL
INC., BERKEL & COMPANY, CONTRACTORS,
INC., BIG APPLE WRECKING & CONSTRUCTION CORP.,
BOVIS LEND LEASE LMB, INC., BREEZE CARTING
CORP., BREEZE NATIONAL INC., BRER-FOUR
TRANSPORTATION CORP., BURO HAPPOLD
CONSULTING ENGINEERS, P.C., C.B. CONTRACTING
CORP., CANRON CONSTRUCTION COP., CORD
CONTRACTING CO., INC., DAKOTA DEMO TECH;
DIAMOND POINT EXCAVATING CORP., DIEGO
CONSTRUCTION, INC., DIVERSIFIED CARTING, INC.,
DMT ENTERPRISE, INC., D'ONOFRIO GENERAL
CONTRACTORS CORP., EAGLE LEASING &
INDUSTRIAL SUPPLY INC., EAGLE ONE ROOFING
CONTRACTORS, INC., ED DAVIES, INC., EN-TECH**

**NOTICE OF
ADOPTION OF
ANSWER TO
MASTER COMPLAINT**

CORP., EVERGREEN RECYCLING OF CORONA
(EROC) EWELL W. FINLEY, P.C., EXECUTIVE
MEDICAL SERVICES, P.C., FLEET TRUCKING, INC.,
FRANCIS A. LEE EXTERIOR RESTORATION; INC.,
FTI TRUCKING, INC., GILSANZ, MURRAY & STEFICEK
LLP., GOLDSTEIN KOCH SKANSKA INC., LAQUILA
CONSTRUCTION INC., LASTRADA GENERAL
GENERAL CONTRACTING CORP., LESLIE E.
ROBERTSON ASSOCIATES CONSULTING
ENGINEERS, P.C., LIBERTY MUTUAL GROUP;
LOCKWOOD, KESSLER & BARTLESS, INC.
LUCIUS PITKIN, INC., LZA TECH-DIV OF
THORTON TOMASTEEI, MANAFORT
BROTHERS MERIDIAN CONSTRUCTION
CORP., MAZZOCCHI WRECKING INC.,
HUDSON MERIDIAN CONSTRUCTION GROUP;
LLC F/K/A MERIDIAN CONSTRUCTION CORP.,
MORETRENCH AMERICAN CORP., MRA
ENGINEERING, P.C., MUESER EQUIPMENT
CORP., NICHOLSON CONSTRUCTION COMPANY;
PETER SCALAMANDRE & SONS, INC.,
INNACLE ENVIRONMENTAL CORP., PLAZA
CONSTRUCTION CORP., PORT AUTHORITY OF
NEW YORK AND NEW JERSEY; PRO SAFETY
SERVICES, INC., PT&L CONTRACTING CORP.,
ROBER SILMAN ASSOCIATES, ROBERT L. GEROSA
INC., RODAR ENTERPRISES, INC., ROYAL GM, INC.,
SAB TRUCKING INC., SAFEWAY ENVIRONMENTAL
CORP., SEASONS INDUSTRIAL CONTRACTING;
SEMCOR EQUIPMENT & MANUFACTURING CORP.,
SILVERITE SURVIVAIR TISHMAN CONSTRUCTION
CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION
CORPORATION OF NEW YORK; TISHMAN INTERIORS
CORPORATION; TISHMAN SPEYER PROPERTIES;
EQUIPMENT RENTAL CORP., TULY CONSTRUCTION CO.,
INC., TURNER CONSTRUCTION COMPANY; ULTIMATE
DEMOLITION CS HAULING (JOINT VENTURE); VERIZON
NEW YORK, INC., VOLLMER ASSOCIATES
LLP WEEKS MARINE INC., WEIDLINGER ASSOCIATES,
CONSULTING ENGINEERS, P.C., WHITNEY CONTRACTING
INC., WOLKOW-BRAKER ROOKING CORP., WORLD TRADE
CENTER PROPERTIES, LLC WSP CONSTRUCTION, LLC
ZIEGENFUSS DRILLING INC.,

Defendants

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
January 31, 2008

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TO: CHRISTOPHER R. LaPOLA, ESQ.,
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CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 31st day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
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